



S P I R E L A W

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Via Electronic Filing

January 23, 2024

The Honorable Judge Nelson Stephen Roman
U.S. District Court, Southern District of New York
40 Foley Square
New York, NY 10007

Re.: *Raymond Clardy and Imari Armstrong v. Your Hometown Movers LLC*
et. al (7:23-cv-11172-NSR)

Dear Judge Roman:

We represent Defendants Your Hometown Movers LLC, Jake Freeman, and Kate Freedman (collectively “Defendants”), in the above-referenced matter. Defendants were served on January 2, 2024. Based on that service, the current deadline for Defendant, Your Hometown Movers LLC, to respond to the Complaint is January 23, 2024. Defendants Jake Freedman and Kate Freedman have not yet been served.

The undersigned counsel files this letter motion on behalf of Defendant Your Hometown Movers LLC respectfully requesting an extension of time for Defendant to answer, move, or otherwise respond to the Complaint to February 22, 2024. Defendant requests the extension of time to respond to the Complaint as Defendant recently retained undersigned counsel and counsel is in the process of intaking and reviewing Defendants’ files relevant to the underlying litigation.

This is the Defendant’s first request for an extension of time to respond to the Complaint.

Defendants contacted Plaintiff to determine whether Plaintiff consents or opposes Defendant’s request. Plaintiff does not oppose Defendant’s request for an extension of Defendant’s time to respond to the Complaint.

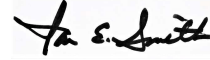
Accordingly, Defendants respectfully request that the Court extend the time for Defendant to file its Answer or other response to the Complaint for 30 days to February 22, 2024.



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We thank the Court for its attention to this matter.

Respectfully,



Ian E. Smith, Esq.

Partner, Spire Law, PLLC